



**NATIONAL
BUSINESS AIRCRAFT
ASSOCIATION, INC.**

March 7, 1991

**ORIGINAL
FILE**

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Federal Communications Commission
Office of the Secretary

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(Ref.: Petition of John Furr, et al
(Requesting Rulemaking concerning
(Standards for Aviation Receivers
(FCC Petition No RM 7610

The National Business Aircraft Association (NBAA) represents business aviation in the U.S. and is supported by 3000 member companies that operate more than 5100 aircraft that provide American business with air transportation services. These organizations, in turn, provide aviation services to an additional 3000 of their affiliate and subsidiary organizations. This totals over 6000 U.S. firms. Eighty-five percent of the Fortune 500 industrial companies are members of the association. A significant number of the total membership also operate internationally to the benefit of the U.S. balance of trade.

NBAA strongly opposes the instant petition that would throw into chaos a system that has proven safe and has maintained that condition by strictly adhering to internationally agreed upon standards set by the ITU and the International Civil Aviation Council (ICAO). The petitioner has provided no proofs except for his own unsubstantiated professions.

While not quibbling with the public benefit devolving from the public broadcast industry, its ubiquitousness in no manner grants it status as superior to the public's need for safe and timely transport.

If we were to grant that the petition's proposals were of technical merit -- which we are not -- the U.S. civil non-airline fleet alone is comprised of over 200,000 aircraft of which 60% are equipped with Instrument Landing System receivers which would have to be replaced. To re-equip this fleet with a new standard (at \$2000 - \$15,000 per unit, present prices) would cost \$1 - 2 billion for equipment alone.

The petition also fails to address the international character of aviation and the fact that aircraft from outside the U.S. would be in compliance with internationally agreed standards and therefore in the U.S. would be subject to potentially harmful interference during the most critical stages of flight, the landing. Current agreements, to be implemented by 1 January 1998, per ICAO Annex 10, Volume 1, § 3.1.4, "Interference immunity performance for ILS localizer receiving systems," provide for these standards, which "shall provide adequate

immunity to interference from two signal, third-order intermodulation products caused by VHF FM broadcast signals..." It further states that after that date "the ILS localizer receiving system shall not be desensitized in the presence of VHF FM broadcast signals having levels" of +15dBm at 88MHz essentially linearly to -10dBm at 107.9MHz.

In the U.S., the Radio Technical Commission for Aeronautics (RTCA) has established MOPS (Minimum Operational Performance Standards) from which the FAA establishes its TSO's (Technical Standard Orders) for onboard avionics. This provides for thorough validation of the equipment carried aboard today's aircraft. Validation that has been coordinated throughout the industry and among the international organizations that are involved and held responsible for maintaining the high safety standards that aviation enjoys, virtually worldwide. It has taken decades to bring about such a highly refined process -- one that provides reasonable levels of spectral efficiency without undue threat (either physical or economic) to the public.

NBAA also supports the Air Transport Association's comments pertinent to this instant petition.

The instant petition should be denied on its merit.

Yours truly,

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